

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket Nos. 1319 and 1407

**CERTIFICATION OF COUNSEL REGARDING DEBTORS’
ELEVENTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)
(Reclassified Claims)**

The undersigned counsel to the Plan Administrator in the above-captioned cases hereby certifies as follows:

1. On June 30, 2025, the *Debtors’ Eleventh Omnibus Objection to Certain Claims (Substantive) (Reclassified Claims)* [Docket No. 1319] (the “Objection”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Objection (the “Proposed Order”).

2. Pursuant to the notice of the Objection, the deadline to file a response to the Objection was July 21, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).²

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

² On July 15, 2025, the Debtors filed and served the *Notice of Filing Revised Exhibit to Debtors’ Eleventh Omnibus Objection to Certain Claims (Substantive)* [Docket No. 1407] (the “Revised Exhibit”) on all parties, including each claimant, who previously received notice of the Objection.

3. Prior to the Response Deadline, the Debtors or Plan Administrator received informal responses to the Objection and Proposed Order from two individual claimants.

4. Additionally, prior to the Response Deadline, the Plan Administrator received a formal response to the Objection and Proposed Order from Paramount Home Collections PVT Ltd. [Docket No. 1460] (the “Paramount Response”).

5. The Plan Administrator has not received any other informal or formal responses to the Objection and Proposed Order.

6. The Plan Administrator resolved the informal responses from the two individual claimants and the Paramount Response has been adjourned to the omnibus hearing currently scheduled for September 22, 2025 at 2:00 p.m. (prevailing Eastern Time).

7. A revised Proposed Order, including the Revised Exhibit, is attached hereto as **Exhibit A** (the “Revised Proposed Order”).

8. A redline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit B**.

9. The Plan Administrator respectfully requests that the Court enter the Revised Proposed Order at its earliest convenience.

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Dated: August 11, 2025
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

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